

1 A Joint Case Management Statement on the above-captioned matter is currently due
 2 September 2, 2025, and an Initial Case Management Conference is set for September 8, 2025, at
 3 2:00 p.m. via videoconference.

4 The parties continue to engage in productive discussions regarding next steps in this case,
 5 with additional discussions anticipated in the near future.

6 The parties therefore respectfully request that the Initial Case Management Conference be
 7 deferred to November 10, 2025 and the Joint Case Management Statement be due November 3,
 8 2025.

9 Respectfully submitted,

10 Dated: August 29, 2025

FERGUSON COHEN, LLP

11 By: /s/ John Q. Kelly
 12 John Q. Kelly
 jqkelly@fercolaw.com

13 *Attorney for Plaintiffs*
 14 DONALD J. TRUMP, KELLY VICTORY,
 15 AUSTEN FLETCHER, AMERICAN
 16 CONSERVATIVE UNION, ANDRES
 BIAGGIANI, MARYSE VERONICA JEAN-
 LOIUS, NAOMI WOLF, AND FRANK
 VALENTINE

17 Dated: August 29, 2025

WILSON SONSINI GOODRICH & ROSATI
 Professional Corporation

18 By: /s/ Brian M. Willen
 19 Brian M. Willen
 bwillen@wsgr.com

20 *Attorneys for Defendants*
 21 YOUTUBE, LLC AND SUNDAR PICHAI

22
 23 SIGNATURE ATTESTATION

24 I, Brian M. Willen, am the ECF User whose ID and password are being used to file this
 25 document. In compliance with N.D. Cal. Civil L.R. 5-1(i)(3), I hereby attest that the concurrence
 26 in the filing of this document has been obtained from the other signatory.

27 /s/ Brian M. Willen
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[PROPOSED] ORDER

Pursuant to stipulation, IT IS SO ORDERED. The Initial Case Management Conference is reset for November 10, 2025. The parties Joint Case Management Statement is due November 3, 2025.

Dated: _____, 2025

Hon. Judge Yvonne Gonzalez Rogers